

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
2015 OCT 27 P 1:52
SUSAN Y. HARRIS
CLERK, US DISTRICT COURT
NO. DIST. OF CA.

WHA

UNITED STATES OF AMERICA,

v.

CR 15 502

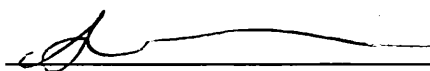
RICHARD LAURENCE STEWART

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 922(a)(1) - Bank Robbery;
18 U.S.C. § 981(a)(1)(c) and 18 U.S.C. § 2461(c) - Forfeiture Allegation

A true bill.



Foreman

Filed in open court this 27th day of

October, 2015

Stephen Ybarra

Clerk



Bail, \$ No process

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Counts 1 to 4:
 18 U.S.C. Section 2113(a) - Bank Robbery (Class C Felony)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: Maximum Prison Term of 20 years;
 Maximum Fine of \$250,000;
 Maximum Term of Supervised Release of 3 years;
 Mandatory Special Assessment of \$100;
 Potential Deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

 DEFENDANT, U.S. DISTRICT COURT
 CLERK, U.S. DISTRICT COURT
 RICHARD LAURENCE STEWART

DISTRICT COURT NUMBER

CR 15 502

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form BRIAN J. STRETCH

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Lloyd Farnham
DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☐ If not detained give date any prior
 summons was served on above charges

 2) ☐ Is a Fugitive

 3) ☐ Is on Bail or Release from (show District)
IS IN CUSTODY
 4) ☒ On this charge

 5) ☐ On another conviction

☐ Federal ☐ State

 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST
 Month/Day/Year
 October 18, 2015

Or... if Arresting Agency & Warrant were not

 DATE TRANSFERRED ☐ Month/Day/Year
 TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

1 BRIAN J. STRETCH (CABN 163973)
2 Acting United States Attorney

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SUSAN L. BROWN
CLERK, U.S. DISTRICT COURT
NO. DIST. OF CA.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

WHA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 RICHARD LAURENCE STEWART,

17 Defendant.
18

CR 15 502
Case No.

) VIOLATIONS: Title 18, United States Code,
) Section 2113(a) – Bank Robbery; Title 18 U.S.C.
) Section 981(a)(1)(c) and Title 28 U.S.C. Section
) 2461(c) – Forfeiture Allegation

) SAN FRANCISCO VENUE
)
)

22 INDICTMENT

23 The Grand Jury charges:

24 COUNT ONE: (18 U.S.C. § 2113(a) – Bank Robbery)

25 On or about May 12, 2015, in the Northern District of California, the defendant,

26 RICHARD LAURENCE STEWART,

27 did knowingly, and by force and violence, and by intimidation, attempt to take away from the persons
28 and presence of employees of the Chase Bank, 1720 Fulton Street, San Francisco, California, property,

1 money, and any other thing of value, belonging to and in the care, custody, control, management, and
2 possession of Chase Bank, the deposits of which were then insured by the Federal Deposit Insurance
3 Corporation (FDIC), in violation of Title 18, United States Code, Section 2113(a).

4 COUNT TWO: (18 U.S.C. § 2113(a) – Bank Robbery)

5 On or about May 13, 2015, in the Northern District of California, the defendant,
6 RICHARD LAURENCE STEWART,
7 did knowingly, and by force and violence, and by intimidation, take away from the persons and presence
8 of employees of the Bank of America, 2310 Fillmore Street, San Francisco, California, approximately
9 \$7,100.00 in United States currency belonging to and in the care, custody, control, management, and
10 possession of Bank of America, the deposits of which were then insured by the Federal Deposit
11 Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section 2113(a).

12 COUNT THREE: (18 U.S.C. § 2113(a) – Bank Robbery)

13 On or about October 14, 2015, in the Northern District of California, the defendant,
14 RICHARD LAURENCE STEWART,
15 did knowingly, and by force and violence, and by intimidation, take away from the persons and presence
16 of employees of the US Bank, 443 Castro Street, San Francisco, California, approximately \$316.00 in
17 United States currency belonging to and in the care, custody, control, management, and possession of
18 US Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation
19 (FDIC), in violation of Title 18, United States Code, Section 2113(a).

20 COUNT FOUR: (18 U.S.C. § 2113(a) – Bank Robbery)

21 On or about October 16, 2015, in the Northern District of California, the defendant,
22 RICHARD LAURENCE STEWART,
23 did knowingly, and by force and violence, and by intimidation, take away from the persons and presence
24 of employees of the California Bank & Trust, 1696 Post Street, San Francisco, California, approximately
25 \$6,760.00 in United States currency belonging to and in the care, custody, control, management, and
26 possession of California Bank & Trust, the deposits of which were then insured by the Federal Deposit
27 Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section 2113(a).

1 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

2 The allegations of Counts One through Four of this Indictment are re-alleged and incorporated as
3 if fully set forth herein. Upon a conviction of the offenses alleged in Counts One through Four above,
4 the defendant,

5 RICHARD LAURENCE STEWART,
6 shall forfeit to the United States, all property which constitutes and is derived from proceeds traceable to
7 said offenses, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

8 If, as a result of any act or omission of the defendant, any of said property:

- 9 a. cannot be located upon the exercise of due diligence;
- 10 b. has been transferred or sold to or deposited with, a third person;
- 11 a. has been placed beyond the jurisdiction of the Court;
- 12 b. has been substantially diminished in value; or
- 13 c. has been commingled with other property which, without difficulty cannot be subdivided;

14 any and all interest defendant has in any other property (not to exceed the value of the above forfeitable
15 property) shall be forfeited to the United States, pursuant to 21 U.S.C. § 853(a)(1) and (p) (as
16 incorporated by 28 U.S.C. § 2461(c)).

17
18 DATED:


A TRUE BILL.

19 10/27/15

20
21 
22 FOREPERSON

23 BRIAN J. STRETCH
24 Acting United States Attorney

25 
26 KEVIN J. BARRY
27 Chief, General Crimes Section

28 (Approved as to form: )

AUSA FARNHAM